

Message

From: Romano, Amy M. [Amy.Romano@wsp.com]
Sent: 6/22/2018 7:45:42 PM
To: Santos, Carmen [Santos.Carmen@epa.gov]
CC: Rykaczewski, Dave A. [Dave.Rykaczewski@wsp.com]; Cepko, Russ P [Russ.Cepko@cbs.com]
Subject: RE: Non detects in input data to ProUCL to calculate 95% UCL of the mean
Attachments: ProUCL Output Nonporous Higher than 8 Ft (061918).xls; ProUCL Output Concrete Walls-1 NE Quadrant (061918).xls

Hi, Carmen:

Thank you for getting us this information. I compared the ProUCL outputs from Sara Ziff's June 12, 2018, e-mail to you to our recommended exposure point concentrations (EPCs) that were provided to you in our March 2, 2018, Draft Cleanup Plan Approach. Provided below is that comparison.

I have highlighted in yellow the recommended EPCs that differ from what was recommended in USEPA Region 9's ProUCL outputs. Our recommended EPC differed from USEPA Region 9's ProUCL outputs for four decision units. For the southeast quadrant walls and southwest loading dock decision units, we had assumed the maximum concentration as the EPC because the ProUCL UCL was greater than the maximum concentration for the dataset. We indicated that assumption in the Draft Cleanup Plan Approach.

For the other two decision units (non-porous surface greater than 8 feet high and northeast quadrant walls), I reran the datasets in ProUCL and got the same suggested UCL as before. I have attached the ProUCL outputs for those two datasets. Please share these outputs with Sara to see if she knows why there is a difference.

Thank you,
 Amy

Exposure Unit	Decision Unit	Frequency of Detection (a)	Total PCBs		USEPA Region 9's ProUCL Output	
			Maximum Detected	EPC		
Indoor Air ($\mu\text{g}/\text{m}^3$)	Indoor Air	5/6	0.098	0.088	0.088	
Non-Porous Surface ($\mu\text{g}/100 \text{ cm}^2$)	8 feet High or Lower	5/29	2.2	1.2	1.2	
	Greater than 8 feet High	40/105	5.7	1.7	1.4	Not ce
	Floor grates and drains	6/9	2.4	1.8	1.8	
Concrete Floors (mg/kg)	Northeast Quadrant	45/45	130	35	35	
	Northwest Quadrant	34/34	210	65	65	
	Southwest Quadrant	43/43	31.9	4.9	4.9	
	Southeast Quadrant	38/38	16	7.5	7.5	
	Interior Office/Mezzanine	11/11	6.31	3.1	3.1	
Concrete/Masonry Building Walls (mg/kg)	Northeast Quadrant	8/8	51	35	82 (exceeds maximum)	Not ce
	Northwest Quadrant	6/6	1.7	1.5	1.5	
	Southwest Quadrant	5/5	0.96	0.95	0.95	
	Southeast Quadrant	4/4	2.2	2.2 (b)	2.3	ProUC assum
	Breakroom/Interior Office	25/25	3.8	1.9	1.9	

Transformer Pit (mg/kg)	Walls and Floor	10/10	4,500	3,102	3102	
Control Room/Storage Room (mg/kg)	Walls	10/10	5.4	3.5	3.5	
Loading Docks (mg/kg)	Northeast Loading Dock (c)	4/4	390	333	333	
	Southeast Loading Dock	5/5	7.0	4.9	4.9	
	Southwest Loading Dock	4/4	3.3	3.3 (b)	3.4	ProUCL assumption
HVAC System (mg/kg)	HVAC Dust	2/2	3.9	3.9 (b)	No ProUCL Output	

a/ Sample locations with duplicate samples were counted once.

b/ The EPC is reported as the maximum detected concentration.

c/ The floor of the northeast loading dock was replaced during PCB remediation activities in 2008. One sample was collected during 2015 cleaning activities to confirm that the concrete has not been recontaminated.

Amy M. Romano
Senior Technical Manager

WSP USA

From: Santos, Carmen [mailto:Santos.Carmen@epa.gov]

Sent: Tuesday, June 19, 2018 2:41 PM

To: Rykaczewski, Dave A. <Dave.Rykaczewski@wsp.com>; Cepko, Russ P <Russ.Cepko@cbs.com>; Romano, Amy M. <Amy.Romano@wsp.com>

Subject: Non detects in input data to ProUCL to calculate 95% UCL of the mean

Hello David, Russ, and Amy,

I have further discussed the issue about non detects internally. We are going to follow the initial recommendation in the attached email that I had sent to David and Russ on May 23, 2018.

In addition, I have attached the results of our review of the ProUCL calculations submitted by David for each separate decision unit. The attached Excel sheets are our own recalculations for each decision unit of the 95% UCL. The email from my colleague, Sara Ziff, also has her notes and comments on her recalculation of the 95% UCLs as compared to WSP's calculations.

Please let me know if you have any questions about this email or the attachments. If you agree, with the information being shared in this email and the attached emails, then I believe we solved one of the non-detects issue which was keeping us from moving forward with preparation of the draft application.

Thank you for your courtesies.

Best,
Carmen D. Santos
PCB Coordinator



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Land Division, LND-4-1

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"I am imagination. I can see what the eyes cannot see. I can hear what the ears cannot hear. I can feel what the heart cannot feel." Zarlenga

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